

# Tilton Beldner LLP

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September 18, 2020

Via ECF

Hon. Judge Lorna G. Schofield  
U.S. District Judge  
Thurgood Marshall Courthouse  
40 Foley Square  
New York, NY 10007

This application is untimely but nevertheless GRANTED. The parties' deadline to file *Cheeks* materials is extended to **October 5, 2020**.

Dated: September 21, 2020  
New York, New York



LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE

Re: Maldonado, et al v. Dougert MGMT Corp. 20-CV-5122 (LGS)

Dear Hon. Judge Schofield:

This firm is co-counsel in our representation of Defendants in the above referenced matter, and I write on behalf of all parties to respectfully request an extension of the deadline to submit a settlement agreement and motion for court approval pursuant to *Cheeks v. Freeport Pancake House, Inc.*, 796 F.3d 199 (2d Cir. 2015). The parties have drafted settlement language and are in the process of finalizing the agreement. However, despite our best efforts, the parties anticipate difficulty in finalizing the agreement by the current deadline of September 21, 2020. The parties respectfully request a two-week extension. If granted, the new deadline would be October 5, 2020. This is the parties' first request for an extension of the deadline set by the court. Should the court grant this request, no future deadlines would be effected.

Thank you for your time and consideration regarding this matter.

Very truly yours,

/S/  
Joshua Beldner

CC: VIA ECF  
*Counsel for all parties*